

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
EDWARD ROBERT LICHWICK, JR.,

Plaintiff,

08 Civ. 3892 (SCR)

-vs-

AFFIDAVIT OF EDWARD R. LICHWICK, JR.

VERIZON,
Defendant.

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STATE OF NEW YORK)
) ss:s.
COUNTY OF ORANGE)

Edward R. Lichwick, Jr., hereby states under pains and penalties of perjury:

1. I worked for Verizon, in whose names my pay checks were issued.

2. I understood that Verizon divided itself into separate operating entities and that

Verizon, Pennsylvania, Inc. was and is one such subsidiary of Verizon Communications, Inc. ("Verizon"), which we commonly refer to as Verizon. I understood this was for purposes of operating efficiency but that Verizon acted as one entity and considered me to be an employee.

3. I understand that Verizon Pennsylvania, Inc, now claims that I worked exclusively from and in Pennsylvania and denies that it is an arm of a unified company called Verizon. Neither statement is true. For several years after 2000, I was dispatched from my home in Port Jervis, New York to jobs. I had a company vehicle, which I drove to my home. I then would receive calls from my supervisor telling me where to report for jobs. I was considered on duty while driving to and from my home in New York. In the second instance, Verizon considers me an employee of it, not of Verizon Pennsylvania, Inc. and, to my understanding, so reports my employment to federal regulators.

4. While it is true that the jobs for Verizon I performed were normally in Pennsylvania, in the case of an emergency or other condition needing manpower, we were dispatched to New York or other states to assist.

5. As I understand it, Verizon is my employer; Verizon is a multi-state company headquartered in New York and has its human resources functions at headquarters in New York.

6. To the best of my knowledge, the foregoing statements are true and correct.

Dated: July 25, 2008
Goshen, NY


EDWARD R. LICHWICK, JR.

SIGNED AND SWORN TO ME
ON THIS 25th DAY Of JULY 2008:


NOTARY PUBLIC

CHRISTOPHER D. WATKINS
Notary Public, State of New York
No. 02WA6124421
Qualified in Ulster County
Commission Expires March 28, 2009